

A000000746

Forgery - Falsely and fraudulently making or altering a writing or other instrument.

Gambling - The making of any bet or wager and/or the organization of or participation in any lottery, numbers game, pool, or bookmaking for money or property.

Harassment - A form of discrimination prohibited by federal and state law. Harassment includes, but is not limited to, unwelcome and offensive slurs, jokes or other verbal, graphic or physical conduct relating to an individual's race, color, religion, ancestry, national origin, age or handicap/disability which are so severe or pervasive in nature that they create, or pose a realistic threat of creating, an intimidating, hostile, disruptive or offensive educational environment.

Illegal Absence- An absence from school for all students of compulsory school age (8-16 years) for reasons other than those defined as "legally excused."

Illegal Alcohol - Any malt, brewed, or distilled beverage, the purchase or possession of which by a person under twenty-one years of age is prohibited by Pennsylvania State Law.

Illegal Drug -

1. Any substance (other than food) which affects the structure or function of the human body when introduced into the body by ingestion, injection, inhalation, or any other means; the possession, delivery, or use of which is prohibited by Pennsylvania and/or Federal Law, unless prescribed by a physician or licensed by the state or federal government to possess, deliver, or use such substances.
2. Any legal substance not intended for introduction into the human body, but which when introduced into the body affects the structure or function of the human body; which is possessed for the purpose of introduction into the body; and the introduction into the body of such substance is prohibited by Pennsylvania or Federal Law (such as solvents).

Infraction - Breaking of a law.

Instigate - To provoke, incite.

Institutional Vandalism - Vandalism of any school; educational facility; community center; church, synagogue, or other place used for religious worship or purposes; cemetery, mortuary, or other place used for the burial or memorializing of the dead; the grounds adjacent to and owned by such places; and any property located within any such place.

Insubordination - Outright refusal to obey a directive from any staff member after repeated attempts have been made to encourage the student to comply without disciplinary action being initiated.

Intimidate - Frighten or compel by words or gestures.

Loitering - Hang around, to lag behind, to aimlessly stop or pause without legitimate purposes.

A000000747

“Look-alike” drugs/substances – Any substance that substantially resembles or is meant to represent any illegal drug or unauthorized substance.

Misrepresentation – Any attempt to distribute a substance which has been inaccurately described or implied to the receiver as an unauthorized substance.

Plagiarize - Steal and pass off as one’s own the ideas or words of another; to present as one’s own idea or product an article derived from an existing source.

Possession - A student will be deemed to be in “possession” of any object if it is found on the person of the student, in the student’s locker, under the student’s control while he/she is on school property, on property being used by the school, at any school function or activity, at any school event held away from the school, or while the student is on his/her way to or from school.

(NOTE: Possession includes ownership, but is not limited to ownership.)

Psycho-educational - Psychological development of an individual in relation to her/his education.

Riot - Disorderly conduct by three or more persons for the purposes of committing or facilitating the commission of a crime, for the purpose of preventing or coercing official actions, or when the actor knows a firearm or deadly weapon will be used.

School Entity - The school district legally responsible for keeping students’ academic and discipline records.

Sexual Harassment - Any words, gestures, or conduct of a sexual nature, including sexual advances and requests for sexual favors, which the actor knows or should know are unwelcome by the person to whom they are directed.

Smoking - The use or possession of tobacco or tobacco products on any part of school property, including school buses. Tobacco is defined as “a lighted or unlighted smoking product and smokeless tobacco in any form.” (Senate Bill 1315)

Stealing -

1. Taking the property of another without the intent of returning the property to the owner.
2. Obtaining possession of the property of another by deception, extortion, or blackmail without the intent of returning the property to the owner.
3. Failing to return or make reasonable efforts to return property to its owner, or to turn found property in at an appropriate “lost and found”.
4. Taking possession of property one knows or has reason to know is stolen, without the intent of returning it to the owner.

A000000748

Tardiness - Tardiness is the absence of a student at the time any forenoon or afternoon session begins, provided the student is in attendance before the close of that session.

Tardy to Class - The absence of a student at the beginning bell of class or assembly.

Terroristic Act - An offense against property or involving danger to another person.

Terroristic Threat - A threat to commit any crime of violence to another or to cause evacuation of a building, place of assembly or facility or to cause serious public inconvenience, or in reckless disregard of the risk of causing such terror or inconvenience.

Trespassing - Entering or remaining in or on property, knowing or having reason to know that one is not permitted to enter or remain.

Truancy - Leaving school during school hours without school authorization or absence from school for reasons other than those defined as legally excused. "Truancy" is the failure of compulsory education aged students (8-16 years) to comply with the compulsory education/truancy provisions of the Pennsylvania Public School Code. A student's accumulation of three illegal absences within one school year shall trigger the start of the truancy process.

Unauthorized substance - shall include but are not limited to alcohol, illegal drugs, controlled substances, non-prescription drugs and prescription drugs which are being used in an abusive or unlawful manner or in a manner for which they were not intended or prescribed, anabolic steroids, look-alike drugs/substances and any substance which is intended to alter mood.

Unexcused Absence - The absence of a student who is beyond compulsory school age (17 years or older) for one of the following reasons:

1. Parental neglect - Parent knows of the absence (examples: unauthorized trips, baby-sitting, errands, housework, oversleeping)
2. Truancy
3. Hunting

Use (of an unauthorized substance) - Either the actual use during school or being under the influence during school hours or at school-sponsored activities after school hours or use prior to arrival at school which evidences itself by strong odor or any unusual behavior.

Vandalism - Deliberate or reckless destruction of damage to or defacement of property.

Weapon - Shall include, but not be limited to, any of the following or any replica or look-alike of the following: guns; firearms; knives; metal knuckles; straight razors and razor blades; noxious, irritating or poisonous gases, including mace and pepper spray; poisons, explosive materials; bombs; missiles; chains; metal objects or any other object designed for protection or designed to harm others, or any object intended by the student to do bodily injury or threat of bodily injury to another.

A000000749

Zero Tolerance - Any violation of the District's policy concerning assault, physical acts of violence, weapons or terroristic threats/terroristic acts will result in the student's immediate suspension from student's school. The student will be referred to the Board of Education of the School District of the City of Erie for discipline up to and including expulsion for a period of not less than one (1) year. Charges must be filed with the appropriate law enforcement agencies.

#387831

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
1. Assault/Physical Acts of Violence – deliberate or reckless attempt to hurt or harm others, physical menace. Zero Tolerance	10 days Out-of-School Suspension. May not participate in any school events, including graduation.	To Board of Education for discipline up to and including expulsion	Conference	Notification of Police. Charges must be filed.
2. Cheat/Plagiarize	1. Saturday Detention. Zero for assignments. 2. 3-5 days Program for After School Suspension (P.A.S.S.). 3. Minimum 5 days Program (Out-of-School Suspension (O.S.S.).	Student Assistance Program	Conference Conference Conference	
3. Classroom/Laboratory Safety	1. Removal from the laboratory/class where the safety hazard was created. No credit for the laboratory/class for that day. Saturday Detention. 2. 3 Days Program for After School Suspension (P.A.S.S.). No credit for the laboratory/class for that day. 3. 10 days O.S.S. No credit for the laboratory/class for that day.	Student Assistance Program Alternative Education	Conference Conference Conference	

A000000750

E 000000148

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
4. Computer Misuse (failure to follow the rules and regulations of the District's "Computer/Internet Acceptable Use Policy," including the unauthorized entry into or use of files of another)	1. Minimum 5 days Program for After School Suspension (P.A.S.S.).	Possible referral to Board of Education for discipline up to and including expulsion	Conference	Charges may be filed.
	2. 3 to 5 days O.S.S. Withdrawal from course.		Conference	Charges may be filed.
	3. 5 to 10 days O.S.S.; possibility of discipline up to and including expulsion		Conference	Charges may be filed.
5. Detention - Failure to Report	1. Minimum Administrative Detention		Conference	Charges will be filed.
6. Disorderly conduct	1. Minimum 5 days O.S.S.	Student Assistance Program	Conference	Charges will be filed.
	2. 10 days O.S.S.		Conference	Charges will be filed.
	3. 10 days O.S.S.; possibility of discipline up to and including expulsion	Possible referral to Board of Education for discipline up to and including expulsion	Conference	
7. Disrespect	1. Saturday Detention.		Parent contact	
	2. Minimum three (3) days Program for After School (P.A.S.S.)	Student Assistance Program	Conference	
	3. Minimum three (3) days Out-of-School Suspension (O.S.S.)		Conference	

E 000000149

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians Conference	Notification of Legal Authorities
8. Electronic devices (possession or use of pagers, cellular phones on school grounds, school vehicles, school sponsored activities; possession use of headphones, video games, radios).	1. Confiscated. After-School Detention. Parents pick up electronic device.		Conference	
	2. Saturday Detention. Parents pick up electronic device.			
	3. 3rd and succeeding Program for After School Suspension (P.A.S.S.). Parents to pick up electronic device.			
9. Endangerment a. Arson b. Bomb Threat c. Riot d. Setting off false fire alarms e. Tampering with fire extinguishers	10 days O.S.S. Restitution/repair.	Possible referral to the Board of Education for discipline up to and including expulsion	Conference	Notification of Police Charges must be filed
10. Extortion	1. 5-10 days O.S.S. Restitution.	Alternative Education or referred to the Board of Education for discipline up to and including expulsion	Conference	Charges will be filed.
11. False identification	1. Saturday Detention.		Conference	
	2. 3 days program for After-School Suspension (P.A.S.S.)	Student Assistance Program	Conference	Charges may be filed.
	3. 5 days Program for After-School Suspension (P.A.S.S.)		Conference	Charges may be filed

E 000000150

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

A000000753

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
12. Fighting (interference, agitation)	1. Minimum 3 days O.S.S.	Student Assistance Program	Conference	
	2. Minimum 5-10 days O.S.S.	Alternative Education	Conference	Charges may be filed.
	3. 10 days O.S.S.	Alternative Education		
13. Forgery	1. Saturday Detention		Conference	
	2. 3 days Program for After School Suspension (P.A.S.S.)	Student Assistance Program	Conference	
	3. 5 days program for Out-of-School Suspension (O.S.S.)		Conference	Charges may be filed.
14. Gambling	1. Saturday Detention		Conference	
	2. 3 days Program for After School Suspension (P.A.S.S.)	Student Assistance Program	Conference	Charges may be filed.
	3. Third and succeeding offenses minimum 3-5 days Program for Out-of-School Suspension (O.S.S.)	Student Assistance Program	Conference	Charges may be filed.
15. Harassment a. Sexual harassment	1. Minimum of 5 days Out-of-School Suspension (O.S.S.), with possible discipline up to and including expulsion.	Referral for possible related educational activities. Referral to the Board of Education for discipline up to and including expulsion.	Conference	Charges will be filed.
			Parent Contact	

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
b. Harassment (other than sexual harassment)	1. Saturday Detention	Peer Mediation/Conflict Resolution	Conference	Charges may be filed.
	2. Minimum 3 days Out-of-School Suspension (O.S.S.)	Student Assistance program	Conference	Charges may be filed.
	3. 5 days Out-of-School Suspension (O.S.S.), with possible discipline up to and including expulsion	Student Assistance Program; possible referral to Board of Education for discipline up to and including expulsion		Charges will be filed.
16. Insubordination	1. Saturday Detention		Parent contact	Phone call or written notice.
	2. Minimum 3 days Program for After School Suspension (P.A.S.S.)	Student Assistance Program. Counselor.	Conference	
	3. Third and Succeeding minimum 3-5 days Out-of-School Suspension (O.S.S.)		Conference	
17. Loitering	1. Saturday Detention		Parent contact	
	2. Minimum 3 days Program for Out-of-School Suspension (O.S.S.)	Counselor	Conference	Charges may be filed.
	3. Third and Succeeding minimum 5 days Out-of-School Suspension (O.S.S.)			Charges may be filed.

A000000754

F 000000152

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
18. Profane, vulgar language	1. Saturday Detention		Parent contact	
	2. Minimum 3 days Program for After School Suspension (P.A.S.S.)	Student Assistance Program	Conference	
	3. Minimum 3 days Out-of-School Suspension (O.S.S.)		Conference	
19. Smoking and student "Look Out"	1. Saturday Detention.		Conference	Charges filed. Fine + court costs.
	2. 3 days Program for After School Suspension (P.A.S.S.)		Conference	Charges filed. Fine + court costs.
	3. Third and succeeding minimum 3-5 days After School Suspension (P.A.S.S.)		Conference	Charges filed. Fine + court costs.
20. Stealing	1. Minimum of 3-5 days Out-of-School Suspension (O.S.S.) to expulsion. Restitution MUST be made.	Possible referral to School Board of expulsion.	Conference	Charges may be filed.
21. Student dress a. Violation of general student dress rules applicable to schools which have not adopted a mandatory dress code policy	1. After School Detention – must change clothes.		Parent Contact	
	2. Saturday Detention – must change clothes.		Conference	
	3. Minimum 3-5 days Program for After School Suspension (P.A.S.S.). Student must change clothes.		Conference	

A000000755

F 000000152

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
b. Violation of mandatory dress code policy in those schools where adopted	1. Meeting with school counselor regarding requirements of dress code; verbal warning.		Telephone conference	
	2. Second verbal warning; after-school detention.		Telephone conference	
	3. Third verbal warning; after-school detention.		Telephone conference	
	4. Suspension, and for subsequent violations, possible referral to the Board of Education for discipline up to and including expulsion.	Possible referral to the Board of Education for discipline up to and including expulsion.		
22. Student Parking. Loitering in parking area.	Car will be towed.			
	1. Saturday Detention		Conference	
	2. 3 days Program for After School Suspension (P.A.S.S.)		Conference	Charges may be filed.
	3. Minimum 3-5 days Program for After School Suspension		Conference	Charges may be filed.
23. Student transportation	Report filed with principal Action per written school code Possible denial of bus privileges		Conference	Charges may be filed.
24. Terroristic threats/acts Zero Tolerance	10 days Out-of-School Suspension (O.S.S.)	Referred to Board of Education for discipline up to and including expulsion	Conference	Charges must be filed.

E 000000154

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians Conference	Notification of Legal Authorities Charges will be filed.
25. Trespassing	Minimum of 3-5 days Out-of-School Suspension (O.S.S.)			
26. Unauthorized Substances (Illegal Drug Policy)	1. Suspension for ten school days. Possible referral to alternative education. Must have drug and alcohol assessment.	Student Assistance Program.	Conference	Police notified if violation involved controlled or illegal substance.
		Possible referral to Board of Education for discipline up to and including expulsion.	Conference	Police notified if violation involved controlled or illegal substance.
	1. Suspension for ten school days. Referral to alternative education and possible discipline up to and including expulsion.	Referral to Board of Education for discipline up to and including expulsion.	Conference	Police notified if violation involved controlled or illegal substance.
b. Possession of unauthorized substance with intent to deliver	1. Suspension for ten school days. Possible referral to alternative education. Must have drug and alcohol assessment.	Student Assistance Program	Conference	Police notified if violation involved controlled or illegal substance.
c. Misrepresentation of an unauthorized substance	2. Suspension for ten school days. Referral to alternative education and possible discipline up to and including expulsion.	Possible referral to Board of Education for discipline up to and including expulsion.	Conference	Police notified if violation involved controlled or illegal substance.

E 000000155

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
2001-2002

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
d. Possession of paraphernalia	1. Suspension for ten school days. Possible referral to alternative education. Must have drug and alcohol assessment. 2. Suspension for ten school days. Referral to alternative education and possible discipline up to and including expulsion.	Student Assistance Program Possible referral to Board of Education for discipline up to and including expulsion.	Conference	Police notified if violation involved controlled or illegal substance.
27. Vandalism	Minimum of 3-10 days Out-of-School Suspension (O.S.S.) Restitution or repair MUST be made. 10 days Out-of-School Suspension (O.S.S.) Immediate removal and expulsion for a minimum of 1 year.	Possible Alternative Education or referral of the Board of Education for discipline up to and including expulsion from the District.	Conference	Charges may be filed.
28. Weapon use or possession of a gun, weapon or destructive device or look-alike object or replica. Zero tolerance.	Expulsion for one year.	Referral to the Board of Education for expulsion for a minimum of one year.		Charges must be filed.

A000000758

E 000000156

A000000759

E 000000157

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
ATTENDANCE
 2000-2001

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
1. Unexcused absence—the absence of a student who is beyond compulsory school age (17 years or older) for reasons other than those defined as legally excused. Zero given for classes missed.	1. Saturday detention. 2. 3 days Program for After School Suspension (P.A.S.S.) 3. Third and succeeding offenses, 5 days Program for After School Suspension (P.A.S.S.)	Counselor	Conference Conference 3 days unexcused – written notice 4 days unexcused – conference Monitor attendance for 20 school days	
2. Illegal absence—the absence from school for all students of compulsory school age (8-16 years) for reasons other than those defined as legally excused. Zero given for classes missed.	1. Saturday detention. 2. 3 days Program for After School Suspension (P.A.S.S.) 3. Third and succeeding offenses, 5 days Program for After School Suspension (P.A.S.S.)	Counselor Children & Youth Services Truancy Report (ages 8-16)	Conference Conference Contact to parents made through notifications of truancy process.	Police contact may be made. Truancy procedure through District Justice enacted.
3. Unexcused tardy to homeroom and class. Zero for all classes/missed.	1. 1 st , 2 nd , 4 th , 6 th , 7 th , 9 th unexcused tardies – Teacher Detention. 2. 3rd unexcused tardy – Administrative After School Detention 3. 5 th unexcused tardy – Administrative Saturday Detention 4. 8 th unexcused tardy – 3 days Program for After School Suspension (P.A.S.S.) 5. 10 th unexcused tardy/Repeat Offenders – 5 days Program for After School Suspension (P.A.S.S.)	Counselor Counselor May be referred to the Student Assistance Program	Conference Conference Conference	Police Contact may be made. Charges will be filed with the District Justice. Fines + Costs.

A000000760

T 0000000158

The School District of the City of Erie, Pennsylvania
Situational Categories For Discipline
ATTENDANCE
 2000-2001

A000000761

Situational Category	Discipline	Referral	Notification of Parents/Guardians	Notification of Legal Authorities
4. Leaving without permission (class cut). Zero for all classes missed.	1. Saturday Detention.	Counselor	Conference	District Justice. Charges may be filed. Fine + Costs.
	2. 3 days Program for After School Suspension. (P.A.S.S.)		Conference	
	3. Third and succeeding offenses - 5 days Program for After School Suspension (P.A.S.S.)		Conference	Same as above.
5. Class cut. Zero for all classes missed.	1. Saturday Detention.	Counselor	Conference	District Justice Charges may be filed
	2. 3 days Program for After School Suspension. (P.A.S.S.)		Conference	Fine + Costs
	3. 3rd and succeeding offenses 5 days Program for After School Suspension (P.A.S.S.)		Conference	Same as above.

387831

A000000762

HOTLINE NUMBERS

Alcoholics Anonymous.....	452-2675
CDC/National HIV/AIDS.....	1-800-342-2437
CDC National HIV/AIDS (Spanish.....	1-800-344-7432
Community House.....	459-5853
Community Integration/Crisis Services.....	456-2014
Drug/Alcohol Information.....	459-4581
Erie County Health Department.....	451-6700
Erie County Department of Children and Youth.....	451-6600
Erie Hotline.....	453-5656
Family Services.....	864-0605
Hamot Mental Health.....	877-6136
Healthy Baby Line.....	1-800-986-BABY
HIV AIDS (Pennsylvania).....	1-800-662-6080
Hospitality House.....	454-8161
National Child Abuse.....	1-800-422-4453
National Runaway Hotline.....	1-800-621-4000
Rape Crisis.....	455-9414
Rape Hotline.....	1-800-352-RAPE
Runaway Hotline (Boys Town).....	1-800-448-3000
St. Vincent Mental Health.....	454-5151
Talking Phone Book.....	454-3099
Youth Crisis Runaway Hotline.....	1-800-HIT-HOME

A000000763

E 000000161

A000000764

E 000000162

A000000765

Dr. James E. Barker
Superintendent of Schools

BOARD OF SCHOOL DIRECTORS

Jim Herdzik, President

Tim Pearson, Vice President

Tom Casey

John C. Harkins

Richard R. Hilinski

Casimir J. Kwitowski

Nancy R. Nielsen

Eva Tucker, Jr.

Samuel L. Vona

Lois Owens
Board Secretary

Dr. John F. Linden
Assistant Superintendent of Schools

E 000000163

A000000766

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for
 RACHIE P. AND DENISE L. by
 and for K [REDACTED] L.,

Plaintiffs,

v.

SCHOOL DISTRICT OF THE CITY
OF ERIE, PENNSYLVANIA; JANET
WOODS, individually and in
her capacity as Principal of
Strong Vincent High School;
LINDA L. CAPPABIANCA,
individually and in her
capacity as Assistant
Principal of Strong Vincent
High School,

Defendants.

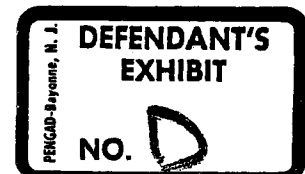
No. 03-390 Erie

Jury Trial Demanded

AMENDED COMPLAINT

Preliminary Statement

1. The Plaintiffs bring this action under Title IX of the Education Amendments of 1972, §901(a), *as amended*, 20 U.S.C. §1681, *et sequitur*; 42 U.S.C. §1983; and Article I, §26 and §28 of the Pennsylvania Constitution. Plaintiffs, who are female minors, were victimized by severe and outrageous sexual harassment in the fall and winter of 2001 while they were students at Strong Vincent High School, located in Erie, Pennsylvania. The harassment culminated in their being victims of a violent and criminal sexual assault



A000000767

perpetrated by older students. Before and after the assault, Plaintiffs reported the peer to peer sexual harassment. The individual Defendants recklessly and intentionally violated state and federal law and did nothing to ensure that Plaintiffs would not be victims of sexual harassment. In fact, the individual Defendants eventually exacerbated the situation, by treating the Plaintiffs, who were 12 years old at the time, as if they were sexually promiscuous and willing participants in the violent sexual assault. Once the Plaintiffs' victimization became known throughout the school community, the Plaintiffs were treated to threats, taunts and teasing, and the Defendants did nothing to curtail this continued harassment, either. The boys who raped the Plaintiffs were not even removed from the school, and continued to be assigned to classes to which the Plaintiffs were assigned. Plaintiffs were unable to continue participating in the educational programs offered by the Erie School District and suffered profound mental, emotional and educational injury as a result of the events which are the subject of this action.

Jurisdiction

2. This court has jurisdiction by virtue of 28 U.S.C. §1331 as the claims raised by Plaintiffs arise under federal law. Plaintiffs also request this court assume supplemental jurisdiction over their state law claims by virtue of 28 U.S.C. §1367.

A000000768

Parties

3. Richard P., the father of R[REDACTED] P., brings this action on her behalf. R[REDACTED] P. is a resident of the Western District of Pennsylvania. She is currently fifteen years old. Her date of birth is [REDACTED] 1988. Denise L., the mother of Kristina L., brings this action on behalf of K[REDACTED] L. K[REDACTED] L. is a resident of the Western District of Pennsylvania, and her birth date is [REDACTED] 1989. She is currently fourteen years old.

4. The Defendants are: the School District of the City of Erie, Pennsylvania ("Erie School District"), which is a public and governmental entity charged with providing public education to residents of the city of Erie; Janet Woods, who was Principal of the Strong Vincent High School at the time of the events giving rise to these actions; and Linda Cappabianca, who was Vice Principal of the school at the time of the events giving rise to this action.

5. The Erie School District, Cappabianca, and Woods acted under color of state law with respect to the actions which are the subject of this Complaint. Cappabianca and Woods were policymakers for the Erie School District insofar as they were the highest administrators assigned to Strong Vincent. Cappabianca and Woods

A000000769

were also the administrators with the power and authority to curtail the sexual harassment from which the Plaintiffs suffered.

Statement of the Facts

General Statement Applicable to Both Plaintiffs

6. Plaintiffs were twelve-year-old girls in 2001. R[REDACTED] P. and K[REDACTED] L. enrolled at the Erie School District's Strong Vincent High School at the beginning of 2001 as seventh graders. They each had resided outside the Erie School District the year before. Both R[REDACTED] P. and K[REDACTED] L. were special education students whose education was governed by an Individualized Education Program (IEP).

7. Strong Vincent High School tolerated a high level of offensive sexual conduct among its students.

8. Enrolled as a seventh grader, the Plaintiff K[REDACTED] L. was sexually harassed by older students in the school throughout the fall of 2001. She reported the incidents to the Defendant Cappabianca who ignored K[REDACTED] concerns. Cappabianca took no steps to stop the harassment directed at K[REDACTED]

A000000770

9. Eventually, the unchecked sexual harassment culminated in a violent sexual assault on each of the Plaintiffs on November 27, 2001. The assault was carried out by the older students who had been harassing K[REDACTED] L.

10. Defendant Cappabianca was the school administrator responsible for discipline. K[REDACTED] L. and R[REDACTED] P. immediately reported the assaults. However, Cappabianca ignored the report of the violent sexual assault, as she had ignored the earlier reports of harassment. She failed to report the assaults to appropriate criminal or child welfare authorities. She also failed or refused to initiate school disciplinary policies and procedures that would have required an investigation and discipline of the offending students. She even failed to remove the sexual predators from the Plaintiffs' classes. The perpetrators of the assault were allowed to remain not only in the school but in the Plaintiffs' very classes, without any controls on their conduct or contacts with the Plaintiffs.

11. After the rapes, K[REDACTED] L. and R[REDACTED] P. became the victims of vicious taunting by male students, which were accompanied by additional threatened sexual assaults.

A000000771

12. Knowing that the assault had occurred, Vice Principal Cappabianca and Principal Janet Woods in turn victimized the Plaintiffs by suggesting, or insinuating, that they were at fault for the sexual assault.

13. On at least two occasions in December 2001, R [REDACTED] P. only narrowly avoided further sexual assaults in the school building by the same group of aggressors. The Erie School District's failure to take remedial steps encouraged other students to join in the harassment of the Plaintiffs.

14. Eventually, criminal charges were filed against the individuals who perpetrated and organized the sexual assault. The males who had assaulted R [REDACTED] P. and K [REDACTED] L. were convicted of delinquency in juvenile court proceedings and the female who had organized the activity was convicted, as well. Upon information and belief, the School District was aware that one of the boys who was involved with assaulting Plaintiffs had a prior history of sexual molestation of young girls.

15. Each of the Plaintiffs was severely psychologically damaged by the conduct not only of the aggressors but of school officials as well. The girls were forced to withdraw from Strong Vincent and were placed in residential treatment centers for

A000000772

disturbed juveniles. Their educational progress has been significantly and, in all likelihood, permanently disrupted.

Particularized Facts Applicable to the Plaintiffs

Kristina L. v All Defendants

16. Kristina L. is currently 14 years old. Her date of birth is July 5, 1989. Kristina moved to Erie, Pennsylvania, from Meadville, Pennsylvania, as she was beginning seventh grade. Kristina was enrolled in Strong Vincent High School in Erie at the beginning of the 2001-2002 school year. Because of language problems and borderline normal intelligence, she was placed in the Learning Support program.

17. Almost immediately upon enrollment, Kristina then 12 years old, a petite, pretty, and slow-learning girl, became the prey for a group of predatory older students who bullied her. At first they called her stupid and retarded, then escalated by saying sexually aggressive things to her. Kristina followed school instructions by reporting the harassment to Assistant Principal Linda L. Cappabianca as well as to various teachers. Kristina was told to "suck it up" and ignore her harassers. Kristina's mother also talked to the Defendant Cappabianca, to no avail.

A000000773

18. K[REDACTED] continued to bring the increasingly frightening behavior to the attention of teachers and administrators, but her complaints were routinely disregarded. For example, K[REDACTED] told the Principal, Mrs. Woods, the Assistant Principal, Ms. Cappabianca, and a teacher, Ms. Scully, that an older student, C[REDACTED] B., had threatened to take her into the bathroom and force her to perform oral sex on him. When K[REDACTED] became increasingly emotional about the harassment, the response of the teachers and administrators was to criticize her for complaining.

19. The students who were harassing Kristina -- C[REDACTED] B., A[REDACTED] K., and B[REDACTED] C. -- were also in K[REDACTED] classes. K[REDACTED] became so frightened of the group that one day she hid in the restroom rather than encounter the students in her class. For this action, Ms. Cappabianca punished K[REDACTED] by placing her on after school detention ("P.A.S.S." (Program for After-School Suspension)) for one week. This punishment required K[REDACTED] to remain after school until 6:30 p.m.

20. On Tuesday, November 27, 2001, K[REDACTED] was serving the first day of her "P.A.S.S." discipline. For some reason, K[REDACTED] was released early from detention, with no notification given to her mother. Even though the school was responsible for the "P.A.S.S." students until 6:30 p.m., there were no teachers or

A000000774

administrators posted outside the school to protect a student such as K[REDACTED] who was released early.

21. While waiting for her mother, K[REDACTED] was grabbed by Charles B. He pulled her into a corner behind the laundromat that was across the street from the school. He forced her head back and violently compelled her to engage in forced oral sex.

22. K[REDACTED] got away from Charles B. and ran into the laundromat. Ordinarily there was an attendant at the laundromat and K[REDACTED] felt safe waiting there. Unfortunately, on that day there was no attendant. Instead, B[REDACTED] C., another student who had been harassing K[REDACTED] was there. She hit K[REDACTED] in the head with an object and threatened to hurt K[REDACTED] if she told anyone about what Charles B. had done. Again, K[REDACTED] ran away, this time to an area outside the school. When K[REDACTED]'s mother found her, K[REDACTED] was still hiding. She did not tell her mother what had happened.

23. The day after the attack, K[REDACTED] told one of her teachers and Ms. Cappabianca about the attack. Ms. Cappabianca's response was that K[REDACTED] should not have engaged in this activity, that it was something done by people in love. Ms. Cappabianca failed to follow mandatory procedures for reporting

A000000775

abuse of a minor to appropriate juvenile authorities. She failed to initiate school discipline policy regarding assaults and sexual harassment. The perpetrators of the violent sexual assault were not removed from the school, the police and child welfare workers were not contacted, and no effort was made to separate K[REDACTED] from C[REDACTED] B. and B[REDACTED] C. K[REDACTED] was forced to sit in the classroom with her assailants on a daily basis.

24. When it became clear that school officials and teachers would not help her, and that C[REDACTED] B. and B[REDACTED] C. would be free to continue to victimize her, K[REDACTED] became very withdrawn and severely depressed. On January 4, 2002, she intentionally burned herself and was admitted to Millcreek Community Hospital. She finally told her mother, Denise L., about the rape and advised her of the knowledge of Ms. Cappabianca and her teachers. The next day Denise L. went to the school and confronted school officials with this information. Ms. Cappabianca and another school official admitted to knowing about the rape and told Mrs. Long that they were "dealing" with it.

25. The school counselor came to a meeting at the hospital and said K[REDACTED] was being removed from Strong Vincent because other students were harassing her because of the rape. K[REDACTED] was then removed from the school and placed at Sarah A. Reed

A000000776

Children's Center, ostensibly for her safety. Following that placement she was enrolled in a different Erie public school. Her behavior became increasingly violent and suicidal and she is now in a residential treatment center, as a result of the conduct complained of herein. K██████ was driven from the Erie School District by the sexual harassment from which she suffered and can no longer attend public school in the Erie School District.

R██████ P. v All Defendants

26. R██████ P. also was enrolled as a seventh grader in Strong Vincent High School in September of 2001. She and her family had recently moved to Erie from Arizona.

27. R██████ P. had become friends with K██████ L., and on November 27, 2001, when D██████ L. could not find K██████ because K██████ had been released early and assaulted by other students, R██████ P. became involved in looking for K██████ L. R██████ P. stumbled upon the students who had sexually assaulted K██████ L., and became the second victim of a violent predatory sexual assault that night. The assault of R██████ P. included forced oral sex undertaken by two males, C██████ B. and A██████ K. The sexual assault also occurred near the laundromat, across the street from Strong Vincent High School. The incident also involved a physical

A000000777

assault by the same female student, B[REDACTED] C. R[REDACTED] did not confide in her parents concerning the assault.

28. Within days of the sexual assault, R[REDACTED] P. also advised Assistant Principal Cappabianca as well as a substitute teacher of the incident. She reported to Cappabianca that two males had forced her to engage in oral sex against her will, and that a female student had attacked her and threatened to attack her for resisting the sexual assault.

29. R[REDACTED] began seeking Cappabianca's protection as she became the target of taunts and threats from other students who learned that she had been sexually assaulted. When R[REDACTED] complained that students were taunting her, threatening her and harassing her over the incident, Cappabianca called Rachel P. a "filthy little girl" and told R[REDACTED] P. that she was aware of what Rachel P. was doing.

30. Cappabianca, although empowered to discipline the students who assaulted R[REDACTED] P. and who were harassing her on an ongoing basis, did nothing. Cappabianca, however, imposed an after-school detention on R[REDACTED] P., apparently for reporting the sexual attack which had victimized her.

A000000778

31. Several days later, Cappabianca telephoned R[REDACTED] P. in R[REDACTED] P.'s presence and referred to R[REDACTED] P. as a "dirty little girl" and stated that R[REDACTED] had a "foul mouth" and advised Richard P. to punish or discipline his daughter. She told Richard P. that R[REDACTED] P. was engaging in oral sex, without providing any other information to illuminate R[REDACTED]'s plight. She gave him no information about the rape.

32. Knowledge of the fact that R[REDACTED] P. and K[REDACTED] L. were victims of rape quickly spread throughout the school. The fact that R[REDACTED] P., a 12-year-old, had been sexually assaulted became known to most, if not all, of the students and upon information and belief to most, if not all, of the faculty. R[REDACTED] P. was shunned by female students and sexually harassed by male students. Throughout the month of December 2001, students at the Strong Vincent High School ridiculed, taunted and teased R[REDACTED] P., and repeatedly suggested, in lascivious and threatening fashion, that Rachel P. engage in oral sex. Male students would accost her demanding sex.

33. R[REDACTED] P. continued to seek the help or protection of Ms. Cappabianca on repeated occasions in December 2001. She advised Ms. Cappabianca of the unbearable harassment she was experiencing. Ms. Cappabianca took no steps to end the harassment. Instead,

A000000779

Cappabianca once again referred to R[REDACTED] P. as a "filthy little girl who needs to grow up."

34. On at least two occasions in December, R[REDACTED] P. was cornered by groups of students in the school and threatened with an impending sexual assault. On one occasion, R[REDACTED] P. was forced into a stairwell where she was surrounded by students, while a young male began threatening an imminent sexual assault. As a teacher walked by the stairwell, R[REDACTED] seized the serendipitous opportunity to escape from the students. When she tried to explain what had happened to the teacher, Ms. Cappabianca, who was in the vicinity, intervened and told Rachel to go to class. On another occasion, a group of students cornered R[REDACTED] P. in a hallway. The students were sexually threatening and taunting R[REDACTED] in the plain view of Defendant Cappabianca. Cappabianca yanked R[REDACTED] P. from the students' presence but did nothing to discipline the students who were harassing R[REDACTED] P.

35. Cappabianca was aware of the rape incidents, by virtue of having been told by both R[REDACTED] P. and K[REDACTED] L. After K[REDACTED] L. attempted to injure herself in early January 2002, Cappabianca scheduled a meeting with R[REDACTED] and R[REDACTED] P. At that meeting, Principal Woods used graphic vulgar language to describe R[REDACTED]'s conduct. The discussion occurred in the presence of R[REDACTED] P. and

A000000780

her father. Woods and other administrators advised Richard P. that the School District officials had been aware of the sexual assault but had done nothing about it. A counselor informed Richard P. that oral sex was as common among students as shaking hands. At this time, Woods told Richard P. that R[REDACTED] P. had to be removed from the school for her safety. The boys who assaulted her were allowed to remain in the school.

36. After this meeting, Richard P. confronted Cappabianca who acknowledged and admitted that she was aware of the assault but had done nothing to report it.

37. R[REDACTED] P. was assigned to Sarah Reed in January 2002, which is a school for troubled children. Following R[REDACTED] P.'s reassignment from Strong Vincent, Richard P. learned that Defendant Cappabianca was advising other parents to keep their children away from R[REDACTED] P. because of her purported sexual activity.

38. During the course of the next several months, R[REDACTED] P. suffered severe and significant emotional distress, depression, anxiety, self-hatred, and self-loathing, and threatened suicide. She was involved in violent incidents with her parents and committed to a psychiatric hospital on several occasions.

A000000781

39. In the fall of 2002, R[REDACTED] P. was once again assigned to Strong Vincent High School. On her first day there, she was subject to taunting, teasing and ridicule by the students and a police officer was called to escort her out of the school when she violently reacted to the sexual harassment. R[REDACTED] P. has been excluded from the educational program offered by the Erie School District because of the sexual harassment which she endured.

Causes of Action

Count I

R[REDACTED] P. and K[REDACTED] L. v Erie School District,
Claim Under Title IX

40. Title IX of the Education Act provides, with certain exceptions, that "[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance." 20 U.S.C. §1681(a).

41. The Erie School District receives federal financial assistance.

42. The Erie School District had elaborate disciplinary policies that related to sexual harassment and assaults, among other disciplinary issues. However, the policies did not spell out

A000000782

how a victim was to report the assault or harassment. K[REDACTED] and R[REDACTED] followed the sparse directions given to students regarding reporting of problems, telling the Assistant Principal assigned to seventh graders, Ms. Cappabianca. There apparently was no effective investigative procedure in place because Erie School District officials did not undertake an investigation upon learning of the sexual harassment or the assaults.

43. The Erie School District had actual knowledge of the circumstances of the rape and subsequent treatment of R[REDACTED] P. and K[REDACTED] L. by teachers. Cappabianca and Woods were aware that K[REDACTED] L. and R[REDACTED] P. were victims of sexual harassment and the violent sexual assault. Knowledge of the rape and the sexual taunting and teasing faced by R[REDACTED] P. and K[REDACTED] L. on a daily basis had spread among the teachers, guidance counselors, and students. In the face of that knowledge, the administrators, teachers and counselors who had the ability to alter the situation, were deliberately indifferent to the harassment directed at R[REDACTED] P. and K[REDACTED] L. Consequently, the perpetrators were emboldened by the discovery that their activities would not be curtailed or punished. In effect, school officials became sponsors of the perpetrators' behavior. The misconduct in this case occurred on school property, during school time, and, in K[REDACTED] case, immediately after school. The Defendants retained substantial

A000000783

control over the conduct of the students who perpetrated the sexual harassment and assault.

44. Rather than taking steps to immediately terminate the harassment and discrimination and devise ways that K [REDACTED] L. and R [REDACTED] P. would not be deprived of their right to education and their ability to enjoy a free and public education in an environment appropriate for them, the School District in fact turned the tables and treated R [REDACTED] P. and K [REDACTED] L. as if they were the sexual predators instead of the victims of a violent, degrading, and painful sexual assault, and the unbearable experience of taunting, shunning and sexual harassment that followed the assault.

45. R [REDACTED] P. and K [REDACTED] L. have been excluded from the educational programs offered by the Erie School District because the sexual harassment inflicted on them was so severe that they could not continue to bear the day-to-day trauma of being in school.

A000000784

Count II

R[REDACTED] P. and K[REDACTED] P. vs.

Cappabianca and Woods

Article I, §§26 and 28 Pennsylvania Constitution -
Prohibition Against Discrimination Based on Gender

46. Article I, §26 of the Pennsylvania Constitution outlaws discrimination by the Commonwealth or any political subdivision thereof.

47. Article I, §28 of the Pennsylvania Constitution outlaws discrimination based on sex or gender.

48. By virtue of having placed the Plaintiffs in harm's way, and by failing to protective the Plaintiffs from sexual assault, the Defendants abridged the Plaintiffs' rights under Article I, §§26 and 28 of the Pennsylvania Constitution.

Count III

R[REDACTED] P. vs. Linda Cappabianca

49. After the incidents described in the Complaint, Linda Cappabianca had a meeting with a parent of a friend of R[REDACTED] P. The meeting occurred at Linda Cappabianca's instigation.

A000000785

50. In that meeting, Cappabianca said that "Ra[REDACTED] was 'giving head' to boys or performing 'blow jobs' in school. She mentioned that this conduct was occurring in the gym, the basement, the bathroom, and the cafeteria." While she was telling the parent this, Cappabianca made a sucking motion with her mouth to show Johnson what Ra[REDACTED] had been doing to boys. Ms. Cappabianca also told Johnson that Ra[REDACTED] had been caught doing these kinds of things in school. She also told Johnson that Cappabianca knew that Ra[REDACTED] was engaging in sexual conduct at the "smokers' corner" or the laundromat near the school.

51. These statements were not true.

52. There was no privilege to confide the information to the parent.

53. The statements were defamatory and suggested that Ra[REDACTED] P., a twelve-year-old girl, was sexually promiscuous, when, in fact, the opposite was the case, and she was a victim of a sexual assault. They were intended to ruin the reputation of Ra[REDACTED] and cause her to be held in contempt and low esteem by her peers and the community, because they were made in front of one of Rachel's friends.

A000000786

54. R[REDACTED] P. suffered severe and significant injury as a result of the defamatory statement made by Cappabianca. Her reputation was injured.

55. The statements constitute slander per se, since they impugn R[REDACTED] P.'s character and suggested that she was sexually promiscuous.

56. WHEREFORE, R[REDACTED] P. requests this Court assume jurisdiction over this state law claim and enter judgment in her favor in an amount in excess of \$10,000.00 for compensatory and punitive damages.

Injuries

57. K[REDACTED] L. was subject to a violent sexual assault in spite of her repeated reports and efforts to secure relief from the sexually hostile educational environment to which she was subjected. K[REDACTED] L. and R[REDACTED] P. were subject to a persistent, intense and severe period of ostracism, taunting, teasing, threatened physical assault and other conduct at the hands of their peers, which centered on their being victims of the sexual assault. This harassment caused both R[REDACTED] P. and K[REDACTED] L. to suffer severe emotional distress and mental illness. Each was

A000000787

hospitalized on numerous occasions. K[REDACTED] L. attempted suicide and inflicted injuries upon herself. R[REDACTED] P. became withdrawn, violent, and spiraled into a period of self-loathing and engaged in self-destructive conduct. Each was denied educational opportunity and, in essence, deprived of the right to an education because of the conduct of the Defendants. The girls had to be separated from their families in order to receive residential therapeutic treatment.

Relief

58. R[REDACTED] P. and K[REDACTED] L. request this court assume jurisdiction over this case and enter judgment in their favor against the Defendants in an amount which compensates them for the injuries they have sustained. They also seek punitive damages against the individual Defendants and counsel fees, costs of this action, and such other relief as is just and appropriate.

Respectfully submitted,



Edward A. Olds, Esquire
Pa. I.D. No. 23601
Carolyn Spicer Russ
Pa. I.D. No. 36232
Richard S. Matesic
Pa. I.D. No. 72211
1007 Mount Royal Boulevard
Pittsburgh, PA 15223
(412) 492-8975

Case 1:03-cv-00390-SJM Document 58-8 Filed 08/18/2005 Page 44 of 50

15479	502	STRONG VINCENT H.S.		2001-02
SUDENT I.D.	SC #	SCHOOL NAME		SCHOOL YEAR
P [REDACTED] R [REDACTED] R	07	F	09/09/88	BUFALINO J
SUDENT NAME	GRADE	SEX	DOB DATE	COUNSELOR
[REDACTED]	ST	RICHARD	4557955	
HOME ADDRESS	PARENT/GUARDIAN	HOME PHONE		

[illegible]

1-8-02. Seen for Anger Management. - RJB.
1-9-02 Follow up session but Rachel not in school.
Called home. - no answer.

A000000791

STRONG VINCENT H.S.
1330 WEST EIGHTH STRE
ERIE PA 16502
PHONE: 874-6500

01/16/02
REPORT DATE



PUPIL PROGRESS REPORT

TO THE PARENT OR GUARDIAN OF
PUPIL NAME

ERIE PA 16503
ST
16503

The School District of the City of Erie, Pa.

963479 P R R 0224 07 2001-0
STUDENT NO. STUDENT NAME
7488 BUFALINO J 1417 MANUS C
COUNSELOR ADVISOR

CREDITS EARNED BEFORE THIS YEAR GPA BEFORE THIS YEAR 2.115 66 OF 11
CAREER GPA CAREER GRADE

PROMOTED
GRADE
RETAINED
GRADE

COURSE NO.	SEC.	COURSE	TEACHER	CREDIT VALUE	1st QUARTER		2nd QUARTER		3rd QUARTER		4th QUARTER		TOTAL CREDITS EARNED		GRADE
					GR.	COMM.	GR.	COMM.	GR.	COMM.	GR.	COMM.	GR.	COMM.	
1009	04	ENGLISH LS	MANUS C	1.00	86		95								
1059	01	READING LS	SCULLY V	1.00	71		84								
2009	03	SOC STUDIES LS	MANUS C	1.00	83		90								
3009	01	MATH LS	GRAY JB	1.00	88	R	80								
4019	03	SCIENCE LS	SCULLY V	1.00	88		60								
6212	03	HOME EC 7	YALLINONT	.50	70		51	JKO					51		
8202	01	GEN MUSIC 7 (D)	GRAHAM L	.50	54		67						57		
9202	01	GYM 7	ACKE M	.50	60	KO	51	KO					51		
6.50 - TOTAL CREDITS ATTEMPTED															
ATTENDANCE RECORD					TOTAL CREDITS EARNED -										
PERIOD															
1 2 3 4															
EXCUSED															
UNEXCUSED															
UNLAWFUL															
TARDY															
TOTAL															
8.0															
0.0															
6.0															
5.0															
TOTAL GRADE POINTS															
16.50															
2.54															
5.2															
110															
2.19															
6.2															
117															

EXPLANATION OF GRADING SYSTEM

A- Superior academic performance indicating an in-depth understanding and exemplary display of the skills included in Pennsylvania's Academic Standards.

B- Satisfactory academic performance indicating a solid understanding and adequate display of the skills included in Pennsylvania's Academic Standards.

C- Marginal academic performance, work approaching, but not yet reaching satisfactory performance. Performance indicates a partial understanding and limited display of the skills included in Pennsylvania's Academic Standards, and the student may need additional instructional opportunities and/or increased student academic commitment to achieve the proficient level.

D- Inadequate academic performance that indicates little understanding and minimal display of the skills included in the Pennsylvania Academic Content Standards. There is a major need for additional instructional opportunities and/or increased student academic commitment to achieve the proficient level.

F- 51-61

COMMENT CODES

- NG. No Grade
- IN. Incomplete
- WI. Withdrawn
- J. Lack of interest and effort
- K. Poor class participation
- L. Excessive absenteeism and/or tardiness
- M. Poor shop work
- N. Does not fulfill notebook requirement
- O. Does not report for extra help
- P. Does not fulfill homework assignments
- Q. Demonstrates initiative
- R. Is commended for effort
- S. Parent/teacher conference requested
- T. Obligation due
- U. Demonstrates good work/study habits

D#,SCH YEAR (AS <8485>, <A>LL, <H>IGH ONLY) A000000792
 IIIII,YYYY
 63479,ALL

963479 P [REDACTED] R [REDACTED] DOB-[REDACTED]/88
 CURRENT: SCH-990 GR-09 HR-P
 1994-95: SCH-363 GR-00 HR-001B

.....WITHDRAWALS AND ENTRIES.....
 YPE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 R04 150 5-01 363

...ATTENDANCE....
 EXCUSED - 3.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 0
 DAYS BELONGED 29.0

.....GRADE SUMMARY.....
 CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 94-95 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

63479 P [REDACTED] R [REDACTED] R 1995-96: SCH-363 GR-01 HR-0102

.....WITHDRAWALS AND ENTRIES.....
 YPE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 21 119 3-07 363 0102 01
 21 120 3-08 363

...ATTENDANCE....
 EXCUSED - 12.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 6
 DAYS BELONGED 178.0

.....GRADE SUMMARY.....
 CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 95-96 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

3479 P [REDACTED] R [REDACTED] R 1996-97: SCH-994 GR-01 HR-P

.....WITHDRAWALS AND ENTRIES.....
 YPE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 04 18 9-20 363 0101 01 815 P

...ATTENDANCE....
 EXCUSED - 5.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 0
 DAYS BELONGED 18.0

.....GRADE SUMMARY.....
 CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 96-97 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

9 P [REDACTED] R [REDACTED] A000000793 1997-98: SCH-355 GR-03 HR-0006

.....WITHDRAWALS AND ENTRIES.....
 PE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 04 37 10-23 355

...ATTENDANCE....

EXCUSED - 3.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 5
 DAYS BELONGED 142.0

.....GRADE SUMMARY.....

CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 97-98 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

3479 P [REDACTED] R [REDACTED] 1998-99: SCH-994 GR-04 HR-P

.....WITHDRAWALS AND ENTRIES.....
 PE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 04 94 2-01 355 0011 04 815 P

...ATTENDANCE....

EXCUSED - 2.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 0
 DAYS BELONGED 94.0

.....GRADE SUMMARY.....

CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 98-99 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

1479 P [REDACTED] R [REDACTED] 2000-01: SCH-370 GR-06 HR-0300

.....WITHDRAWALS AND ENTRIES.....
 PE DAY DATE SCHOOL OLD SCH OLD HR OLD GRADE OLD CURRICULUM
 02 146 4-25 370

...ATTENDANCE....

EXCUSED - 4.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 0
 DAYS BELONGED 32.0

.....GRADE SUMMARY.....

CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 00-01 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

9 P [REDACTED] R [REDACTED]

A0000007942001-02: SCH-502 GR-07 HR-0224

...ATTENDANCE....

EXCUSED - 6.0
 UNEXCUSED - 0.0
 UNLAWFUL - 6.0
 TARDY - 5
 DAYS BELONGED 177.0

.....GRADE SUMMARY.....

CREDITS ATTEMPTED - 5.50
 CREDITS EARNED - 4.00
 TOTAL POINTS - 8.50
 GRADE POINT AVERAGE - 1.55
 01-02 RANK - 91 OF 120
 CAREER RANK- 6 OF 120

COURSE	TITLE	CREDITS	TEACHER	SCHOOL	GRADE
1009	ENGLISH LS	1.00	1417-MANUS C	502	70
1059	READING LS	1.00	1786-SCULLY V	502	75
2009	SOC STUDIES LS	1.00	1417-MANUS C	502	70
4019	SCIENCE LS	1.00	1786-SCULLY V	502	71
6202	ART 7 (S)	.50	1394	502	NG
6212	HOME EC 7	.50	3356	502	51
8202	GEN MUSIC 7 (D)	.50	2674	502	57
9202	GYM 7	.50	2709-ACKE	502	51

B479 P [REDACTED] R [REDACTED]

2002-03: SCH-990 GR-08 HR-P

.....WITHDRAWALS AND ENTRIES.....

PE	DAY	DATE	SCHOOL	OLD SCH	OLD HR	OLD GRADE	OLD CURRICULUM
05	54	11-12	403				
12	72	12-13	403		0104	08	815 P

...ATTENDANCE....

EXCUSED - 0.0
 UNEXCUSED - 0.0
 UNLAWFUL - 0.0
 TARDY - 0
 DAYS BELONGED 19.0

.....GRADE SUMMARY.....

CREDITS ATTEMPTED - .00
 CREDITS EARNED - .00
 TOTAL POINTS - .00
 GRADE POINT AVERAGE - .00
 02-03 RANK -
 CAREER RANK-

** NO COURSES FOUND FOR THIS STUDENT **

CAREER TOTALS: CREDITS ATTEMPTED 5.50 POINTS 8.500
 CREDITS EARNED 4.00 GPA 1.545

163479, ALL

A000000795

163479 P [REDACTED] R [REDACTED]
[REDACTED] ST
ERIE PA 16503

CURRENT: SCH-990 GR-09 HR-P
PHONE: [REDACTED] DOB- [REDACTED]/88
PARENT: RICHARD
COUNSELOR:

. 1995-96 SCHOOL YEAR

FORM - 50848 OUT OF SCHOOL SUSPENSION FOR (07) PHYSICAL ASSAULT

SUSPENSION: SCH-363 JEFFERSON GR-01 HR-0102

DAYS: 05/24,28,29

. 2001-02 SCHOOL YEAR

FORM - 25758 IN SCHOOL SUSPENSION FOR (04) SKIPPING CLASS

SUSPENSION: SCH-502 STRONG VINCENT H.S. GR-07 HR-0224

DAYS: 10/30
11/01,02